



Re: FCC Docket 17-258

This letter is to voice our opposition to the proposals made in the NPRM of October 24, 2017 regarding additional changes to the proposed licensing of the CBRS band.

Softcom Internet Communications, Inc. is a Wireless Internet Service provider operating in the Central Valley of California serving approximately 4,000 customers. We offer download speeds of up to 50 mbps. Our coverage area is predominantly rural, and we focus on bringing the best possible service to areas that incumbent providers refuse to service.

Over the years, the FCC has made enhancements to the minimum speeds required for service to be classified as broadband, with the current standard being 25 Mbps download and 3 Mbps upload. This is a very challenging goal to continuously meet. Softcom is ready and willing to meet the task, but we can't do this without having reasonable and affordable access to spectrum.

Since 2011, we have invested significantly in equipment which provides service to our customers in the 3650-3700 band. We have begun investing in LTE equipment in the past two years under the assumption that after the several years that the FCC has spent working with all the appropriate stakeholders (including the Wireless Internet Service Provider Association) in the rulemaking process for the CBRS band adopted in April 2015 would be what we would have to go on in planning and building out our network for the future. Our customers are constantly asking for more bandwidth and our average customer bandwidth consumption year-over-year increase is nearly 20%.

We are counting on the CBRS rules to open up additional spectrum to help us meet the goals that the FCC has laid out; but these proposed rule changes are an antithesis to achieving those goals. The proposed changes to the geographic areas covered by PALs will increase the cost of obtaining a PAL beyond what many companies can afford, thereby awarding these PALs to the large cellular companies.

For example, in our specific case, the PEA for a large portion of our completely rural service area of northern San Joaquin County is clumped in with the San Francisco Bay Area (see attached map). It doesn't require a lot of thought to know that obtaining a PAL using this PEA will be incredibly expensive and effectively lock us out of the market.

In addition, the proposed changes to the length and renewability of the PALs will reduce the availability of PALs to our company. Longer term, guaranteed renewal licenses will increase the attractiveness to the large cellular companies, thereby driving up the price and make the cost of obtaining a PAL unaffordable to a small company such as ours.

It cannot be stated more clearly: these two changes will reduce consumer choice and increase costs for consumers. They are completely skewed towards the large cellular companies, who have shown time and time again that they don't care about consumers and know that if they're the only provider in town offering broadband, they can do whatever onerous things they can think of because they know there won't be other legitimate options for consumers.

The FCC should recognize that small ISPs are the ones bridging the digital divide for Americans who live and work in rural areas, and passing these proposed rules is tantamount to rigging the game for the large cellular companies. The right thing to do is to leave the rules alone and allow us to start using the CBRS band as proposed in the April 2015 order so we can get on with the business that the FCC is asking of us.

For these reasons, Softcom Internet Communications, Inc. strongly opposes the proposed change of the size of PALs and the proposed change to the length of the PALs in the CBRS band.

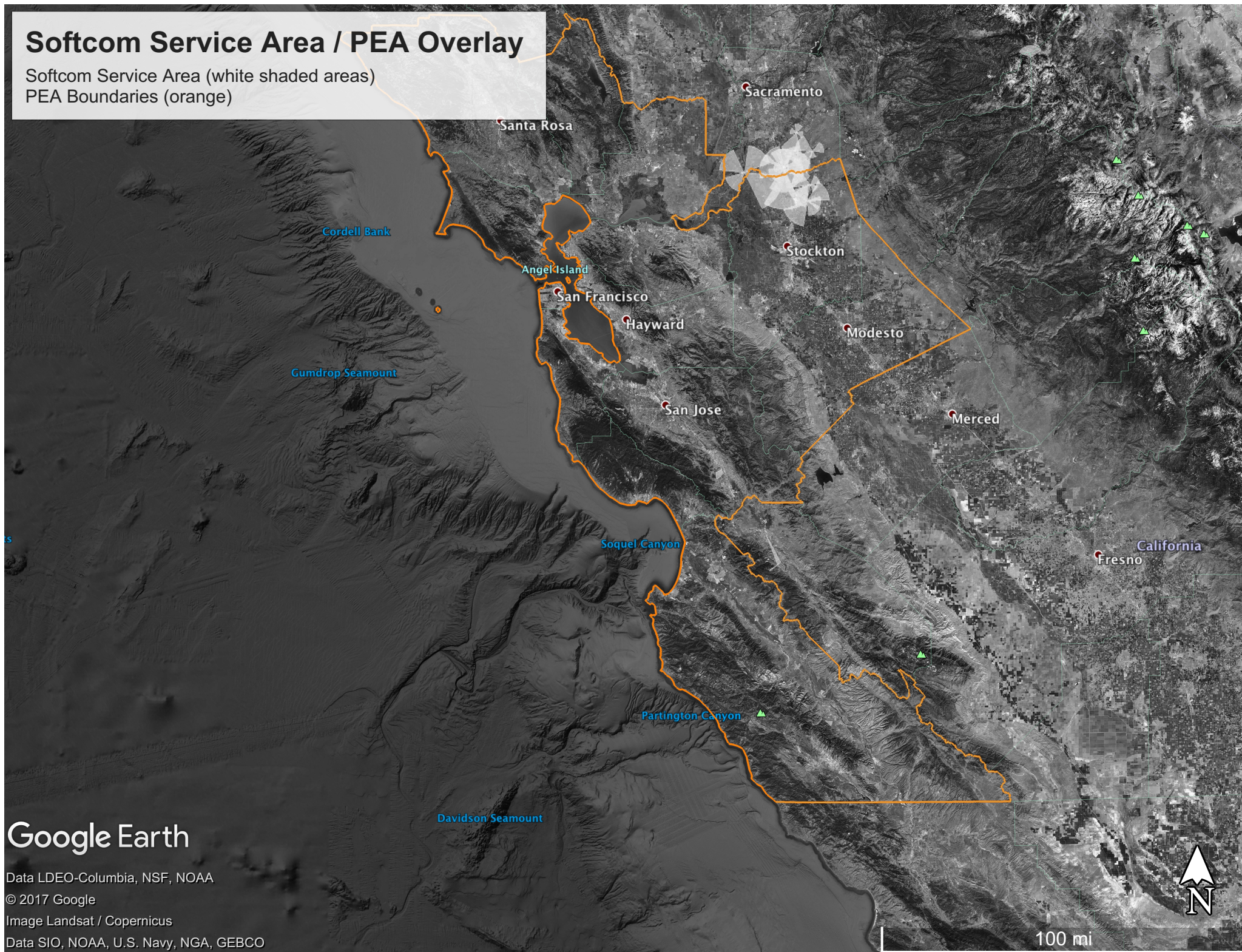


Kevin M Triplett
President & CEO, Softcom Internet Communications, Inc.



Softcom Service Area / PEA Overlay

Softcom Service Area (white shaded areas)
PEA Boundaries (orange)



Google Earth

Data LDEO-Columbia, NSF, NOAA

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